

REMARKS

Claims 1-27 and 29-56 are all the claims pending in the present application¹. Applicants thank the Examiner for withdrawing the rejections of claims 44, 45, 48 and 49 under 35 U.S.C. § 112, second paragraph. Also, Applicants thank the Examiner for indicating that claims 25 and 41 contain allowable subject matter. However, claims 1-24, 26, 27, 29-40 and 42-56 remain rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Curry et al. (U.S. Patent No. 6,233,234).

§ 102(e) Rejections (Curry) - Claims 1-24, 26, 27, 29-40, and 42-56

Claims 1-24, 26, 27, 29-40, and 42-56 are rejected over Curry substantially based on the same reasons set forth in the previous Office Action. The Examiner adds a few new arguments in the *Response to Arguments* section of the Office Action.

With respect to independent claim 1, Applicants previously argued that Curry does not disclose or suggest at least, “a home gateway assigning an ID and a port to each terminal to differentiate terminals sharing one IP address,” as recited in claim 1 and similarly recited in independent claim 6. *See pages 13-14 of Amendment dated July 2, 2007.* In response, the Examiner alleges:

Applicant amends to assign ports and redirect packets according to IP and port information. TCP/IP requires port information. For example, SMTP has a port of 25, and HTTP has a port of 80. The use of TCP/IP in Curry implies the use of port information. When a terminal is using a specific application such as HTTP, that port and the IP information route the packet to the terminal and the appropriate application operating on the terminal.

Curry, col. 10, line 36, taught the use of the TCP/IP protocol. In Stevens' fundamental textbook on this topic, TCP/IP illustrated, Vol. 1, pages 225-26, a diagram of the TCP header within the IP datagram is shown in Fig. 17.1. Fig. 17.2 showed the TCP header

¹ The Examiner mistakenly only indicates that claims 1-27 are pending in the application on the Office Action Summary Sheet.

located in the IP datagram in detail. Note the use of both a 16-bit source port number and a 16-bit destination port number. Also on page 226:

Each TCP segment contains the source and destination *port number* to identify the sending and receiving application. These two values, along with the source and destination IP addresses in the IP header, uniquely identify each connection. [Emphasis in original]

In response, first, Applicants acknowledge that Curry implies the use of port information, however, there is no teaching or suggestion in Curry of a home gateway assigning an ID and a port to each terminal to differentiate terminals sharing one IP address in processing an incoming call and an outgoing call. The use of TCP/IP and the implication of the use of port information is not tantamount to the specific feature quoted above.

Further, the Examiner cites and relies on a secondary reference, Stevens fundamental textbook, to support the rejection of claim 1. Applicants respectfully request that the Examiner officially apply the secondary reference in a new Non-Final Office Action if the Examiner wishes to rely on this reference to support the rejection. Claim 1, for example, is rejected as allegedly being anticipated by Curry. To anticipate a claim, a single reference must disclose each and every feature of the claimed invention. Here, the Examiner attempts to apply Curry in addition to Stevens fundamental textbook to satisfy an anticipation rejection. Applicants respectfully submit that this is improper.

Therefore, at least based on the foregoing as well as the previously submitted arguments, Applicants submit that Curry does not anticipate claim 1 or claim 6.

Applicants submit that dependent claims 2-5 and 54 are patentable at least by virtue of their dependency from independent claim 1.

Applicants maintain that dependent claims 7-27 are patentable at least by virtue of their respective indirect or direct dependencies from independent claim 6.

With respect to independent claims 28 and 29, Applicants maintain that these claims are patentable at least based on reasons similar to those set forth above with respect to claim 1.

Applicants maintain that dependent claims 30-43 are patentable at least by virtue of their direct or indirect dependencies from independent claim 29.

Further, with respect to claims 13, 14, and 31, Applicants previously argued, and would maintain, that that nowhere does Curry disclose or suggest requesting call connection by transmitting the IP address and port number of said first terminal to said second terminal when the call connection is admitted. That is, nowhere does Curry disclose or suggest transmitting a port number. The Examiner does not respond to this argument.

Further, with respect to claims 24 and 40, Applicants previously argued that the Examiner does not cite any particular portion of Curry which allegedly satisfies the features set forth in these claims. In the present Office Action, the Examiner still does not address the merits of these claims.

Further, with respect to claims 27 and 43, Applicants previously argued that the cited portions of Curry only discuss that a gateway provides localized access and security, but do not satisfy the specific features of claims 27 and 43. Applicants maintain the previously presented arguments as the Examiner does not respond to these arguments.

With respect to independent claim 44, Applicants maintain the previously presented argument that Curry does not disclose or suggest at least, “converting the header and payload of the packet according to IP and port information preset for the telephone call, if the packet is for the telephone call, and transmitting the converted packet to a terminal connected to the local IP network,” and “converting the packet according to IP and port information preset for the Internet communication if the packet is for the Internet communication and transmitting the converted packet to the terminal connected to the local IP network,” as recited in claim 44. Similar to the

claims discussed above, the Examiner does not respond to the previously presented arguments with respect to claim 44.

Applicants submit that dependent claims 45-47 are patentable at least by virtue of their dependency from independent claim 44.

Applicants maintain that independent claim 48 is patentable at least based on reasons similar to those set forth above with respect to the independent claims above.

Finally, Applicants maintain that dependent claims 49-53, 55, and 56 are patentable at least by virtue of their respective dependencies.


Conclusion

At least based on the foregoing, as well as the previously submitted arguments, Applicants submit that Curry does not anticipate claims 1-24, 26, 27, 29-40 and 42-56.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,


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